The Honorable Richard A. Jones

1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 UNITED STATES OF AMERICA NO. CR23-178 RAJ and 11 NO. CR23-179 RAJ Plaintiff, 12 v. 13 **GOVERNMENT'S SUPPLMENTAL** MOTION REGARDING SEAL 14 BINANCE HOLDINGS LIMITED, d/b/a 15 BINANCE.COM, and (FILED UNDER SEAL) CHANGPENG ZHAO, aka "CZ," 16 Defendants. 17 18 19 The Court has previously granted motions sealing these cases, and filings in the 20 cases, until 9:00 a.m. on the morning of the plea hearings (which were not set at the time 21 of the initial motions to seal). The plea hearings are now set to begin at 10:00 a.m. on 22 November 21, 2023. After further consideration the United States requests, with the 23 consent of the Defendants, that the case remain sealed, with no entries on the public 24 calendar or docket, until the plea hearing begins at 10:00 a.m. The United States submits

that this adjustment will minimize market disruption and inaccurate speculation that could

harm third parties.

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1	DATED this 20 th day of November, 2023.	
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3	MARGARET A. MOESER Acting Chief	TESSA M. GORMAN Acting United States Attorney
4	Money Laundering and Asset Recovery	Western District of Washington
5	Section, Criminal Division U.S. Department of Justice	U.S. Department of Justice
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7	/s Kevin G. Mosley Kevin G. Mosley	/s Michael Dion Michael Dion
8	Elizabeth R. Carr Trial Attorneys	Assistant United States Attorney
9	JENNIFER KENNEDY GELLIE	
10	Acting Chief	
11	Counterintelligence and Export Control Section, National Security Division U.S. Department of Justice	
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13	/s Beau D. Barnes Beau D. Barnes	
14	Alex Wharton	
15	Trial Attorneys	
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CERTIFICATE OF SERVICE I, Michael Dion certify that I served this filing by email on counsel for the defense on November 20, 2023. /s Michael Dion MICHAEL DION Assistant United States Attorney